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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 BANK OF AMERICA, N.A.,

15 Plaintiff,

16 vs.

17 NORTH AMERICAN TITLE INSURANCE  
18 COMPANY,

19 Defendants.

Case No.: 2:21-cv-00584-KJD-NJK

**STIPULATION TO CONTINUE  
STAY OF CASE**

**(FIRST REQUEST)**

20 Plaintiff, Bank of America, N.A. (“BANA”) and Defendant, North American Title  
21 Insurance Company (“NATIC” and collectively with BANA, the “Parties”), by and through their  
22 respective undersigned counsel, hereby stipulate and agree as follows:

23 **WHEREAS**, on April 8, 2021, BANA filed its Complaint in the Eighth Judicial District  
24 Court, Case No. A-21-832600-C [ECF No. 1-1];

25 **WHEREAS**, on April 9, 2021, NATIC filed a Petition for Removal to this Court [ECF  
26 No. 1];

27 **WHEREAS**, on April 14, 2021, the Parties entered into a Stipulation to Stay Case and  
28 advised the Court the Parties saw potential for settling this matter and agreed to file a status report  
in 90 days [ECF No. 6];

**WHEREAS**, on April 15, 2021, this Court entered its Order on the Stipulation to Stay  
Case [ECF No. 7];

**WHEREAS**, on July 14, 2021, the Parties filed their Joint Status Report in which BANA

1 advised it was preparing a formal settlement demand and the Parties anticipated placing the matter  
2 in mediation. However, the Parties requested an additional 60 days to pursue settlement [ECF No.  
3 9];

4 **WHEREAS**, due to the request of a 60 day extension, on August 4, 2021, the Clerk of the  
5 Court entered a Notice instructing the Parties to refile the Joint Status Report as a Stipulation for  
6 Extension of Time using the same pdf image [ECF No. 10];

7 **WHEREAS**, on August 5, 2021, the Parties refiled the Joint Status Report using the same  
8 pdf image as a Stipulation for Extension of Time pursuant to the Clerk's Notice [ECF No. 11];

9 **WHEREAS**, on October 13, 2021, the Clerk of the Court entered another Notice advising  
10 the Parties the document's title should have been changed a proposed order should have been  
11 added [ECF No. 13];

12 **WHEREAS**, on March 14, 2022, because the parties had not corrected the issues noted in  
13 ECF No. 13, the Court entered a Minute Order denying the Parties' 60 day extension and requiring  
14 the Parties to show cause why this case should not be dismissed by March 21, 2022 [ECF No. 14];

15 **WHEREAS**, on March 17, 2022, the Parties filed a Joint Response to the Court's Minute  
16 Order and advised they desire to continue good faith settlement negotiations and believe that this  
17 matter should remain stayed [ECF No. 15];

18 **WHEREAS**, BANA has submitted a settlement demand to NATIC and the Parties are  
19 considering whether a mediation would be appropriate;

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